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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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HANNAH PAISLEY ZOULEK, a Utah  
resident; JESSICA CHRISTENSEN, a Utah  
resident; LU ANN COOPER, a Utah resident;  
M.C., a Utah resident, by and through her  
parent, LU ANN COOPER; VAL SNOW, a  
Utah resident; and UTAH YOUTH  
ENVIRONMENTAL SOLUTIONS, a Utah  
association,

Plaintiffs,

v.

KATIE HASS, in her official capacity as  
Director of the Utah Division of Consumer  
Protection; SEAN REYES, in his official  
capacity as Utah Attorney General,

Defendants.

**DECLARATION OF AMBIKA  
KUMAR IN SUPPORT OF MOTION  
FOR PRELIMINARY INJUNCTION**

Case No. 2:24-cv-00031-DAK-DAO

Judge Dale A. Kimball

Magistrate Judge Daphne A. Oberg

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I, Ambika Kumar, declare as follows:

1. I am a partner in the law firm Davis Wright Tremaine LLP, have been admitted *pro hac vice* to practice before this Court, and am counsel for Plaintiffs in this matter. I make this declaration from personal knowledge and a review of the files and records in this matter.

2. Attached as Exhibit 1 is a true and correct copy of the following article attributed to Susan Laborde and published on TechReport.com on October 13, 2023: *Teenage Social Media Usage Statistics in 2023*, available at <https://techreport.com/statistics/teenage-use-of-social-media-statistics/>. My office obtained a copy of this article as well as the remaining exhibits to my declaration by visiting the websites listed in each paragraph. In addition, my office has omitted extraneous pages following this article. .

3. Attached as Exhibit 2 is a true and correct copy of the following article attributed to Jessica Hamilton, Jacqueline Nesi, and Sophia Choukas-Bradley and published in the Perspectives on Psychological Science journal on May 17, 2022: *Re-examining adolescent social media use and socioemotional well-being through the lens of the COVID-19 pandemic: A theoretical review and directions for future research*, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9081105/#R21>.

4. Attached as Exhibit 3 is a true and correct copy of the Department of Health & Human Services' *U.S. Surgeon General's Advisory: Social Media and Youth Mental Health*, available at <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>.

5. Attached as Exhibit 4 is a true and correct copy of Meta's June 14, 2022 press release (updated September 14, 2022), titled *New Tools and Resources for Parents and Teens in VR and on Instagram*, available at <https://about.fb.com/news/2022/06/tools-for-parents-teens-vr-and-instagram/>.

6. Attached as Exhibit 5 is a true and correct copy of Snapchat's Support website describing *Tools and Resources for Parents*, available at <https://parents.snapchat.com/parental-controls>.

7. Attached as Exhibit 6 is a true and correct copy of Apple's Support website: *Use Screen Time on your iPhone, iPad, or iPod touch*, available at <https://support.apple.com/en-us/108806>.

8. Attached as Exhibit 7 is a true and correct copy of Google's Support website: *Manage your child's screen time*, available at <https://support.google.com/families/answer/7103340?hl=en>.

9. Attached as Exhibit 8 is a true and correct copy of the homepages of the following services:

- a. Aura, available at <https://www.aura.com/>;
- b. Family Keeper, available at <https://lp2.reasonlabs.com/family-keeper-parental-control-af-2/>; and
- c. Bark, available at <https://www.bark.us/>.

10. Attached as Exhibit 9 is a true and correct copy of a certified transcript of the February 14, 2024 Utah House Judiciary Committee Hearing on HB464, as transcribed by TransPerfect, a vendor hired by my law firm.

11. Attached as Exhibit 10 is a true and correct copy of Utah Senate Bill 194 “Social Media Regulation Amendments,” also available at <https://le.utah.gov/~2024/bills/static/SB0194.html>.

12. Attached as Exhibit 11 is a true and correct copy of excerpts from the Utah State Bulletin, Vol. 23, No. 20 (Oct. 15, 2023).

13. Attached as Exhibit 12 is a true and correct copy of a May 3, 2024 Staff Memorandum from the California Privacy Protection Agency, available at [https://cppa.ca.gov/meetings/materials/20240510\\_item3\\_ab1949\\_memo.pdf](https://cppa.ca.gov/meetings/materials/20240510_item3_ab1949_memo.pdf).

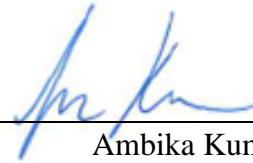
14. Attached as Exhibit 13 is a true and correct copy of the following article attributed to Taylor Barkley at the Utah State University Center for Growth Opportunity and published on February 1, 2023: *Poll: Americans Don’t Want To Share Their Photo ID To Tweet*, available at <https://www.thecgo.org/benchmark/poll-americans-dont-want-to-share-their-photo-id-to-tweet/>.

15. Attached as Exhibit 14 is a true and correct copy of the following Opinion paper by the United Kingdom Information Commissioner: *Age Assurance for the Children’s Code*, published on October 14, 2021, available at <https://ico.org.uk/media/about-the-ico/documents/4018659/age-assurance-opinion-202110.pdf>.

16. Attached as Exhibit 15 is a true and correct copy of the American Psychological Association’s article, *Health Advisory on Social Media Use in Adolescence*, published in May 2023, and available at <https://www.apa.org/topics/social-media-internet/health-advisory-adolescent-social-media-use>.

I declare under penalty of perjury that the foregoing is true and correct.

Signed in Seattle, Washington this 31st day of May, 2024.



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Ambika Kumar